



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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AUG 2 2013

Ref: 8EPR-N

Chip Weber, Forest Supervisor
Flathead National Forest
c/o Richard Kehr, District Ranger
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, Montana 59911

RE: Wild Cramer Forest Health and Fuels
Reduction Project, CEQ #20130177

Dear Mr. Weber:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the June 2013 Final Environmental Impact Statement (EIS) for the Wild Cramer Forest Health and Fuels Reduction Project. This Final EIS was prepared by the U.S. Department of Agriculture Forest Service (USFS) Flathead National Forest (FNF) to analyze potential environmental impacts associated with fuels reduction activities, including harvesting and thinning of trees and prescribed burning within the Island Unit of the FNF.

The EPA provided comments on the Draft EIS in an October 3, 2012 letter. The Draft EIS analyzed five alternatives, but no Preferred Alternative was identified. The action alternatives included potential management activities ranging from 2,055 to 3,538 acres of tree harvesting; 3,687 to 3,890 acres of sapling thinning; and 4.8 to 13.1 miles of new road construction and 5.5 to 14.4 miles of temporary road construction. The EPA's primary concerns with the Draft EIS were related to potential impacts to water resources and air quality from proposed management activities.

The Final EIS identifies the selected alternative as a modified Alternative 3 with management activities including 2,750 acres of tree harvesting; 3,846 acres of sapling thinning; and 7 miles of new road/ 8.2 miles of temporary road construction. We appreciate several of the modifications that resulted in the selected alternative. The selected alternative reduces the number of miles of new and temporary road construction as compared to the Proposed Action, eliminates about half of the harvest units located in the West-South Fork of Stoner Creek drainage reducing impacts to water yield, and eliminates proposed treatments within riparian health conservation areas (RHCAs) in two harvest units. These modifications reduce the potential for impacts to water resources.

The Final EIS also includes expanded discussion and/or corrections to Chapter 3, Affected Environment and Environmental Consequences. Supplemental information also is provided in Chapter 4, Response to Comments on the DEIS. With the expanded discussion and additional information, the Final EIS

provides a more thorough disclosure of potential impacts to air quality and water resources from this project.

We appreciate the USFS's response to our suggestion that the Forest hydrologist and/or fisheries biologist be present when crews are laying out treatment units and marking trees for treatments within riparian areas to ensure riparian and stream protection. The USFS indicates in Chapter 4, Response #28, that the design criteria section of the Record of Decision (ROD) will include the requirement that the fisheries biologist (or representative) be available when laying out the RHCA units. We recommend that this requirement be included in Table A-5, Wild Cramer Project Design Criteria, of the ROD since it appears to have been omitted.

We appreciate the opportunity to review this Final EIS. If we may provide further explanation of our comments, please contact me at 303-312-6925, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation